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**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

FLATWORLD INTERACTIVES LLC

Plaintiff,

v.

APPLE INC.

Defendant.

Case No. 3:12-01956-JSW (EDL)

**APPLE INC.'S RESPONSE TO  
FLATWORLD'S ADMINISTRATIVE  
MOTION FOR IN CAMERA REVIEW OF  
CERTAIN PRIVILEGED DOCUMENTS  
(DKT. NO. 145)**

Apple hereby respectfully submits its response to FlatWorld's Administrative Motion for *in camera* Review of Certain Privileged Documents (Dkt. No 145).<sup>1</sup> Apple does not oppose FlatWorld's request for *in camera* review of the documents indicated in its motion. Apple respectfully notes, however, that, as will be explained in Apple's forthcoming reply in support of its Motion to Disqualify Hagens Berman, to be filed on June 25, Apple believes that the limited universe of documents FlatWorld has offered for *in camera* review is inadequate to address or resolve the issues raised in Apple's Motion to Disqualify (Dkt. No. 137).

Dated: June 18, 2013

/s/ Michael T. Pieja

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<sup>1</sup> Apple notes that FlatWorld's filing was entered in CM/ECF as a "Motion to File Under Seal," even though no documents are sought to be filed under seal, and that FlatWorld has "noted [the motion] for decision" on June 18. Pursuant to Civil Local Rule 7-11, an administrative motion is considered submitted for decision on the date its opposition is due. Although Apple is uncertain of the procedural appropriateness of FlatWorld's motion and of its "not[ing]" the motion for decision on that date, Apple is submitting its response to FlatWorld's filing so it is before the Court on the date designated by FlatWorld.

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**PROOF OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on June 18, 2013, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Civil Local Rule 5.1(h). Any other counsel of record will be served by electronic mail, facsimile and/or overnight delivery.

/s/ Michael T. Pieja

Michael T. Pieja